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Remarks/Arguments

Claims 1, 2, 4, 9, 10, 12, 17, 18, 20, and 25-27 are pending in this application. Claims 1, 2, 9, 10, 17, 18, 25, and 26 have been amended herein. Applicants believe no additional fee is due at this time.

The Examiner has rejected all of Applicants' claims under 35 U.S.C. § 102(b) as anticipated by U.S. Patent 5,754,673 to Brooks et al. ("Brooks"). It is axiomatic that for a rejection of a claim under section 102 to stand, each and every recitation in the claim must be shown in the cited reference. There are numerous recitations in Applicants' claims that are not found in Brooks. In order to fully appreciate this fact, one must appreciate that a fundamental difference between Brooks and Applicants' claimed invention is that Brooks is directed to the processing of paper checks, and Applicants' invention, by contrast, is related to the processing of images and data.

All of Applicants' independent claims, as amended, recite the performance of an optical character recognition (OCR) process on the "stored image of the document." In the case of claims 1, 9, and 17, as amended, the document is forwarded while the stored data field still has the error. In the case of claim 25, as amended, the OCR process is performed on the stored image "after the document has been forwarded." By the Examiner's own admission, the OCR process in Brooks is performed on the document. See page 3, lines 2-3 of the office action, "Brooks also teaches the MICR/OCR reader for reading optical characters **on the document . . .**" Emphasis added. Further, all of Applicants' independent claims, as amended, recite applying "an image-based" correction to the error in the stored data field. Nowhere does Brooks disclose the use of OCR of a stored image to apply corrections to already stored information. Rather, Brooks discloses the use of OCR and MICR reads in conjunction to try and obtain a good initial read from a paper document. Correction is handled via a manual process using the paper document (discussed further below). Support for the recitations described above can be found, at least, in the specification in paragraphs [0007] and [0030]. Applicants respectfully submit that these recitations alone render Applicants' independent claims patentably distinguishable from Brooks.

In addition to the above, Applicants would like to further elaborate on the operator review aspects of their claims in the light of Brooks. As previously mentioned, Applicants'

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claims, as amended, are directed to image-based methods and apparatus in which an automated correction is applied to already stored MICR data. Subject to that automated correction process failing, a manual correction is carried out by "displaying only the stored image to an operator for correction." Brooks, by contrast discloses one correction process; this process involves having an operator look at the paper document either through a window or via a live video feed. There is no discussion in Brooks of presenting a stored image to an operator without the presence of the paper document. Thus the disclosure of Brooks is completely disjunct and teaches away from an Applicants' claimed feature of displaying "only the stored image" to an operator. Support for this recitation can be found, at least, in paragraphs [0009], [0026], and [0030] of the specification. Applicants submit that this recitation also renders Applicants' independent claims patentably distinguishable from Brooks.

Applicants' dependent claims, since they incorporate the recitations of the independent claims as described above, are patentable for at least those same reasons. However, with respect to dependent claims 4, 12, 20, and 27, Applicants would like to point out additional reasons why these claims are not anticipated by Brooks. These claims all recite the use of a "MICR amount" in the OCR process used to correct errors when the stored data field corresponds to the amount of an item. The process of Brooks takes place in advance of a MICR amount being applied to the checks. In fact, one of the functions of the system of Brooks is to determine and apply the MICR amount, since pre-printed blank checks cannot include a MICR amount because the amount that the check will eventually be written for is unknown. The MICR amount is applied in Brooks by either encoder 102 or encoder 210, near the end of processing, after error correction has taken place. Thus, not only does Brooks not teach this recitation of claims 4, 12, 20, and 27, but it is impossible for the system of Brooks to use the MICR amount for correction as recited in these claims. Claims 4, 12, 20, and 27 are patentably distinguishable from Brooks for at least this additional reason.

Applicants have amended dependent claims 2, 10, 18, and 26 only for correct antecedent basis in view of the amendments made to the independent claims. The preamble of claim 1 has been similarly amended, and the "receiving" recitation of claim 1 has been removed for clarity and consistency in view of the new preamble of claim 1. Additional

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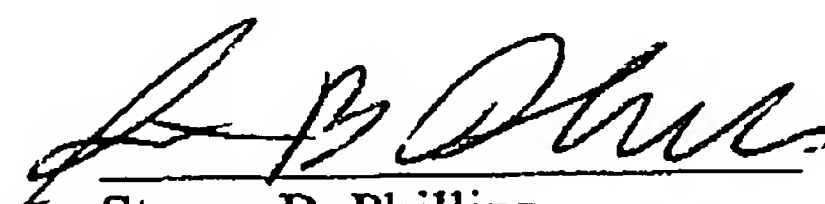
minor amendments have been made to the "forwarding" recitations of claims 1, 9, and 17 for correct antecedent basis. Applicants hope that these minor amendments will meet with the Examiner's approval.

Applicants believe they have responded to all of the concerns raised by the Examiner, and submit that this amendment puts the application in condition for allowance. Entry of this amendment and reconsideration of this application as amended is hereby requested.

Respectfully submitted,

Date: 11 May 06

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